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Attorneys for Defendant: Otto Trucking LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANT OTTO TRUCKING LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL**

Courtroom: 8 (19th Floor)

Judge: Hon. William Alsup

Trial Date: December 4, 2017

Filed/Lodged Concurrently with:

1. Declaration ISO Admin. Mot. to File Documents Under Seal
2. [Proposed] Order
3. Redacted/Unredacted Versions
4. Proof of Service

Pursuant to Civil Local Rules 7-11 and 79-5, Defendant Otto Trucking LLC (“Otto Trucking”) submits this administrative motion for an order to file under seal portions of its Opposition to Waymo’s Second Supplemental Brief in Support of its Motion for Order to Show Cause [Dkt. 2054] (the “Administrative Motion”). Specifically, Otto Trucking requests an order granting leave to conditionally file under seal the confidential portions of the following documents:

Document	Portions to Be Filed Under Seal	Parties Claiming Confidentiality
Otto Trucking’s Opposition to Waymo’s Second Supplemental Brief in Support of its Motion for Order to Show Cause [Dkt. 2054]	Highlighted portions	Plaintiff
Exhibit A to the Walsh Declaration	Entire document	Plaintiff

The highlighted portions of Otto Trucking’s Motion and the entirety of Exhibit A allegedly contain information that Plaintiff Waymo LLC (“Waymo”) has designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order in this case. Otto Trucking opposes Waymo’s designation of confidentiality over these materials except for the designations as to Exhibit 9 to Exhibit A.

Otto Trucking anticipates that Waymo will file any necessary declarations to seal the above information pursuant to Local Rule 79-5, but also anticipates further discussion regarding the appropriateness of Waymo’s designations.

Otto Trucking’s request to seal is narrowly tailored to those portions of the Administrative Motion and its supporting documents that merit provisional sealing based on Waymo’s designations.

Dated: October 25, 2017

Respectfully submitted,

By: /s/ Neel Chatterjee
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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document including all of its attachments with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on **October 25, 2017**. I further certify that all participants in the case are registered CM/ECF users and that service of the publicly filed documents will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed on **October 25, 2017**.

/s/ Neel Chatterjee
NEEL CHATTERJEE